

Message

From: Bell, Nathan [NBELL@idem.IN.gov]
Sent: 5/2/2017 9:24:49 PM
To: Valentino, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=29ccd101653e4a5fae2273a9ae9f7bd0-MValenti]
CC: Bell, Nathan [NBELL@idem.IN.gov]
Subject: Information from IDEM OAQ Permits regarding Tradebe Treatment and Recycling LLC

Mr. Michael Valentino,

Hi, this is Nathan Bell from the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), Permit Branch. I got your voicemail last Friday. Sorry, I was not able to get back to you sooner.

For the past three (3) years, I have been the section chief of the section that issues permits to Tradebe Treatment and Recycling LLC (herein referred to as Tradebe), located at 4343 Kennedy Avenue, East Chicago, Indiana 46312.

In 2014 and 2015, I reviewed a couple source/permit modifications for Tradebe. In 2016, I reviewed the Part 70 (Title V) Renewal for Tradebe.

As you requested in your voicemail, here is a link to the recently issued Part 70 (Title V) Renewal No. 089-35879-00345 for Tradebe Treatment and Recycling LLC (issued October 31, 2016):

[HTTP://PERMITS.AIR.IDEM.IN.GOV/35879F.PDF](http://permits.air.idem.in.gov/35879F.PDF)

In October 2016, IDEM OAQ was contacted by Mr. Jae Lee of EPA Region 5 Hazardous Waste/RCRA Permits with questions about the Solids Distillation System (SDS) at Tradebe. Jae indicated that a person (or lobbyist) representing air pollution control device companies contacted him wanting to discuss the SDS at Tradebe. The person that contacted EPA was likely David Case of the Environmental Technology Council, who had sent the following letter to EPA OECA that is available online at the following internet site: <http://etc.org/media/7229/ETC-Letter-to-Cynthia-Giles-re-TDUs.pdf>

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Prior to the Part 70 (Title V) Renewal No. 089-35879-00345, IDEM OAQ had also issued a Significant Permit Modification No. 089-34503-00345 on March 24, 2015, which can be found at the following link:

<http://permits.air.idem.in.gov/34503F.PDF>

In Significant Permit Modification No. 089-34503-00345, Addendum to the Technical Support Document (ATSD) (See Adobe pdf pages 395 through 505), IDEM OAQ responded to a public notice comment submitted by David Case of the Environmental Technology Council (ETC). In the comment response (see Adobe pdf pages 403 through 405), IDEM OAQ explained why the Solids Distillation System (SDS) is not considered a "hazardous waste combustor" or a "hazardous waste incinerator". This comment response was provided to and reviewed by EPA Region 5 prior to issuing the permit final.

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Let me know if you need anything else or would like to further discuss any issues over email/telephone.

Thank you.

Nathan Bell
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